

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

**PLAINTIFFS' UNOPPOSED AMENDED MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure, Section 5.07 of Administrative Order 167-1, Local Rules 5.03 and 7.01, and the Stipulated Protective Order (the “Protective Order”) entered in this case, ECF No. 62, Plaintiffs Concord Music Group, Inc., Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, and ABKCO Music, Inc. (collectively, “Publishers”) respectfully move for leave to seal the following documents:

- Plaintiffs’ Reply in Support of Motion for Preliminary Injunction, ECF Nos. 91, 92;
- Declaration of Ben Y. Zhao, ECF No. 94; and
- Declaration of Michael D. Smith, and certain attached exhibits, ECF Nos. 91-1, 91-2, 95, 95-1.

Pursuant to Rule 7.01(a)(1), the undersigned counsel certify that they contacted Defendant Anthropic PBC’s (“Anthropic”) counsel via email on February 12, 2024 and were advised that Anthropic joins Publishers’ request to seal certain information, as set forth in the accompanying Memorandum.

Dated: February 15, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2024, I authorized the electronic filing of a true and exact copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notice of such filing to the following:

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